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12 Attorneys for Plaintiffs
13 AMANDA HOUGHTON, CHARLES DOUGLAS,
and SUSAN FRANKLIN

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

19 AMANDA HOUGHTON, CHARLES
20 DOUGLAS, and SUSAN FRANKLIN, on
behalf of themselves and all others similarly
situated.

21 Plaintiffs,
22 v.

23 COMPOUND DAO, a California general
24 partnership; ROBERT LESHNER; GEOFFREY
25 HAYES; AH CAPITAL MANAGEMENT,
LLC; POLYCHAIN ALCHEMY, LLC; BAIN
CAPITAL VENTURES (GP), LLC;
GAUNTLET NETWORKS, INC.; PARADIGM
OPERATIONS, LP,

25 || Defendants.

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Case No. 3:22-cv-7781-WHO

CLASS ACTION

**DECLARATION OF NICHOLAS N.
SPEAR IN SUPPORT OF MOTION FOR
LEAVE TO AMEND FIRST AMENDED
COMPLAINT**

DATE: December 18, 2024
TIME: 2:00 p.m.
PLACE: Courtroom 2
BEFORE: Hon. William H. Orrick

1 I, Nicholas N. Spear, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California, a partner with
3 the law firm of Susman Godfrey L.L.P., and counsel of record for Lead Plaintiffs Amanda
4 Houghton, Charles Douglas, and Susan Franklin. I have personal knowledge of the facts set forth
5 herein, and if called as a witness, would testify competently thereto.

6 2. I make this declaration in support of Lead Plaintiffs' Motion for Leave to Amend
7 First Amended Complaint.

8 3. Attached as Exhibit 1 is a true and correct copy of Lead Plaintiffs' proposed Second
9 Amended Complaint.

10 4. Attached as Exhibit 2 is a true and correct copy of a redline comparing Lead
11 Plaintiffs' proposed Second Amended Complaint to Lead Plaintiffs' First Amended Complaint
12 (Dkt. 76).

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed this 4th day of November, 2024, at Los Angeles, California.

16 By: /s/ Nicholas N. Spear

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